

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

In re:

RMS TITANIC, INC., *et al.*,

Debtors.<sup>1</sup>

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Case No.: 3:16-bk-02230-PMG

Chapter 11

(Jointly Administered)

**CERTIFICATE OF NECESSITY OF REQUEST FOR EMERGENCY HEARING**

I HEREBY CERTIFY, as a member of the Bar of the Court, that I have carefully examined the matter under consideration and to the best of my knowledge, information and belief formed after reasonable inquiry, all allegations are well grounded in fact and all contentions are warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law can be made, that the matter under consideration is not interposed for any improper purpose, such as to harass, to cause delay, or to increase the cost of litigation, and there is just cause to request a consideration of the following pleading on an emergency basis:

**EMERGENCY APPLICATION FOR APPROVAL OF EMPLOYMENT  
OF ROBERT PAUL CHARBONNEAU AND THE LAW FIRM  
OF AGENTIS PLLC AS SPECIAL LITIGATION COUNSEL TO THE OFFICIAL  
COMMITTEE OF EQUITY SECURITY HOLDERS *NUNC PRO TUNC* TO MAY 2, 2018**

I CERTIFY FURTHER that there is a true necessity for an emergency hearing, specifically because, among other reasons, the retention of Agentis Law on an emergency basis is necessary because the Equity Committee is seeking to employ and retain Agentis Law to pursue claims for which the statutes of limitations may expire as early as June 14, 2018. My Certificate of Necessity of Request for Emergency Hearing (Doc. 1016) filed on May 11, 2018, in connection with the Emergency Motion of the Official Committee of Equity Security Holders for Entry of an Order Granting Derivative Standing and Authority to Prosecute and Settle Certain Claims on Behalf of the Debtors' Estates (Doc. 1015) is incorporated herein.

I CERTIFY FURTHER that the necessity of this emergency hearing has not been caused by a lack of due diligence on my part, but has been brought about only by circumstances beyond my control or that of my client. I further certify that this motion is filed with full understanding of F.R.B.P. 9011 and the consequences of noncompliance with same.

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<sup>1</sup> The Debtors in the chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: RMS Titanic, Inc. (3162); Premier Exhibitions, Inc. (4922); Premier Exhibitions Management, LLC (3101); Arts and Exhibitions International, LLC (3101); Premier Exhibitions International, LLC (5075); Premier Exhibitions NYC, Inc. (9246); Premier Merchandising, LLC (3867); and Dinosaurs Unearthed Corp. (7309) (collectively, the "Debtors"). The Debtors' service address is 3045 Kingston Court, Suite I, Peachtree Corners, Georgia 30071.

Dated: May 14, 2018

/s/ Jacob A. Brown

(Signature)

Jacob A. Brown

(Typed Name)

(904) 598-8630

(Telephone Number)